

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

Verisign, Inc.,

Plaintiff,

Case No. 1:14-cv-01749 CMH-MSN

v.

XYZ.com, LLC and Daniel Negari,

Defendants.

**DEFENDANTS' RESPONSE TO VERISIGN, INC.'S MOTION FOR PERMISSION
TO TAKE THE DEPOSITION OF ERNST & YOUNG ON OCTOBER 7, 2015 (ECF 293)**

Defendants XYZ.com, LLC ("XYZ") and Daniel Negari (collectively, "Defendants"), by and through undersigned counsel, file this response to Verisign, Inc.'s Motion for Permission to Take the Deposition of Ernst & Young on October 7, 2015 (ECF 293). Defendants do not object to an October 7, 2015 deposition of Ernst & Young (E&Y) on the limited subject matter identified by Verisign in its motion—E&Y's review of the Network Solutions transaction. (ECF 293, ¶ 9.)

Respectfully submitted,

Dated: September 18, 2015.

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CERTIFICATE OF SERVICE

I certify that on September 18, 2015, I electrically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NED) to the following:

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